REMARKS

Reconsideration of this Application is respectfully requested.

Claims 1, and 3-16 are pending in the application, with claims 1, 10, and 16 being the independent claims.

Based on the above amendments and following remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 102

In the Action on pages 2-3, sections 4-8, claims 1, 3, 7-10 and 13-16 are rejected as being anticipated by "OASIS Security Services Technical Committee SAML Issues List" by Hal Lockhart (hereinafter "Lockhart"). Applicants respectfully traverse the rejection.

As amended, claim 1 recites: A method for secure mutual authentication comprising the steps of: authenticating a customer at a first web site; *after authentication, receiving a selection from said customer at said first web site requiring transfer to a second web site*, wherein said first web site is independent of said second web site; after receiving said selection, generating an authentication message for said customer at said first web site, said authentication message devoid of intelligent information of said customer and comprising a *permanent customer pseudonym that uniquely identifies said customer and is devoid of intelligent information of said customer*; and *after generating said authentication message, transferring said authentication message from said first web site to said second web site for authentication of said customer by said second web site.*

Lockhart teaches, generally, a user going directly to a destination web site without first being authenticated at a source web site. The destination web site redirects the user to the user's home security domain, or source web site, for authentication. Lockhart, page 13 "First Contact". The source web site then authenticates the user and provides an authentication reference, or name assertion reference, and redirects the user to the destination web site with the authentication reference. The destination web site next requests the authentication document from the source web site, and the source web site provides the authentication document to the destination web site,

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which, in response, provides the resource to the user. Lockhart, page 14. Lockhart fails to teach at least thee elements of claim 1.

First, Lockhart fails to teach after authentication, receiving a selection from said customer at said first web site requiring transfer to a second web site. Instead, Lockhart teaches the user initially going directly to the second web site (i.e., the destination web site of Lockhart), *then* being returned to the first web site (i.e. the source web site of Lockhart) for authentication. In contrast, in claim 1, the user *first* authenticates at a first web site, and *then* makes a selection requiring transfer to a second web site.

Second, Lockhart fails to teach a permanent customer pseudonym that uniquely identifies a customer and is devoid of intelligent information of said customer. While Lockhart uses the term "pseudonym", this pseudonym is "an attribute in an assertion that identifies the principal, but is not the identifier used in the principal's home domain." Lockhart, page 15. There is no teaching or suggestion in Lockhart that a pseudonym be devoid of intelligent information of the customer, merely that it be different from the identifier used in the home domain. Further, Lockhart appears to teach a pseudonym having intelligent information: "At an implementation level AND at a specification level, I can't see how a pseudonym should differ from a 'real' name." Lockhart, page 15. In contrast, as disclosed in the specification, the customer pseudonym of claim 1 is unique for a specific customer from a specific site. In operation, the same customer pseudonym could be generated by different partner sites and still be valid. See, e.g., specification, page 9, lines 17-18.

Third, Lockhart fails to teach after generating said authentication message, transferring said authentication message from said first web site to said second web site for authentication of said customer by said second web site. Instead, Lockhart teaches an authentication *reference* transferred from a first web site (i.e., the source web site of Lockhart) to the second web site, which causes the second web site to request an authentication *document* from the first web site. In response to the request, the first web site transfers the authentication document to the second web site. If, *arguendo,* the authentication reference of Lockhart is the same as the authentication message of claim 1, then the authentication reference of Lockhart is not sufficient for the second web site to authenticate.

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Lockhart therefore fails to teach at least three elements of claim 1, and Applicants respectfully assert that claim 1 is not anticipated by Lockhart and request that the rejection be withdrawn and the claim allowed.

Claims 3, 7-9 depend from claim 1 and are allowable as being dependent from an allowable claim.

Claims 10 and 16 recite features similar to those in claim 1 and are allowable for at least the same reasons as given above for claim 1.

Claims 13-15 depend from claim 10 and are allowable as being dependent from an allowable claim.

Rejections under 35 U.S.C. § 103

In the Action on pages 4-5, sections 10-11, claims 4-6, 11 and 12 are rejected as being unpatentable over Lockhart in view of EP 0 940 960 A1 to Le Berre (hereinafter "Le Berre"). Applicants respectfully traverse the rejection.

Claims 4-6 depend from claim 1, claims 11 and 12 depend from claim 10, and are allowable at least for being dependent from an allowable claim.

Further, Le Berre, alone or in combination with Lockhart, fails to overcome the deficiencies of Lockhart with respect to the independent claims. Specifically, Le Berre fails to teach or suggest generating an authentication message that comprises a customer pseudonym that uniquely identifies the customer and is devoid of intelligent information of the customer. Instead, Le Berre teaches sending a signed URL from a first web site to a second web site. The format of the signed URL includes a user ID, which is a "string representing the user." See Le Berre, col. 6, line 41. The signed URL as shown in FIG. 5 of Le Berre does not contain a customer pseudonym that is devoid of intelligent information of the customer, and instead, contains intelligent information of the customer. The user ID and other components of the signed URL in Le Berre are used by Surlserver B to **identify** a customer **in order to authenticate the customer** at the second web site. Le Berre, col. 9, para. 0032. In contrast, the authentication message of claim 1 comprises a customer pseudonym that is devoid of any intelligent information of the customer. Therefore, Le Berre, alone or in combination with Lockhart, fails to teach an authentication message that comprises a customer

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pseudonym that uniquely identifies the customer and is devoid of intelligent information of the customer.

Second, Le Berre teaches away from the combination proposed by the Action. Specifically, Le Berre fails to teach receiving a selection from said customer at said first web site requiring transfer to a second web site, wherein said first web site is <u>independent</u> of said second web site. Instead, Le Berre teaches a multi-homed resource **within one organization**. See, e.g., Le Berre, col. 2, para. 07, 16, and 30. The multi-homed resources of Le Berre have access to the same authentication services. Le Berre does not teach transfer between web sites that are <u>independent</u> of each other. In contrast, in claim 1, the first and second web sites are independent of each other, as described, for example, on page 2, para. 5 of the specification. One of ordinary skill in the art would therefore not be motivated to combine Le Berre with Lockhart because Le Berre contemplates only authentication within a single organization.

Therefore, the combination of Lockhart and Le Berre fail to teach or suggest the claimed invention. Applicants respectfully request that the rejection be withdrawn and the claims be allowed.

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Application No. 10/043,879   Docket No.: 20846-176942
Amendment dated September 29, 2006
Reply to Office Action of June 7, 2006

Conclusion

All of the stated grounds of rejection have been properly traversed, accommodated, or

rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently

outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply

has been made to the outstanding Office Action and, as such, the present application is in condition

for allowance. If the Examiner believes, for any reason, that personal communication will expedite

prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the

number provided.

Dated: September 20, 2006   Respectfully submitted,
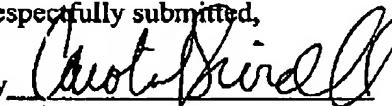
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